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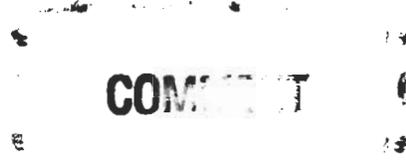
06-09  
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Received CFTC  
Records Section  
11/27/2006

November 22, 2006

**By Email**

Eileen Donovan  
Acting Secretary  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581



Re: Proposed Regulation Regarding Membership in a Registered Futures Association

Dear Ms. Donovan:

I am an attorney who represents clients who will be affected by the proposed amendment to CFTC Reg. §170.15 if the amendment is approved by the Commission. In order to provide an orderly time for transition, and permit sufficient time for registrants affected by the proposed amendment to determine their future course of action if the proposed amendment is approved, I hereby request that, if the Commission should adopt the proposed amendment, it make the amendment effective 60 days after approval.

Very truly yours,

William J. Nissen

WJN:sn

cc: Helene Schroeder (by e-mail)